

# TSD File Inventory Index

Date: August 27, 2002

Initial: CMK/ewas

Facility Name: <u>Dexam Industrial Packaging (the Federal Site)</u>		
Facility Identification Number: <u>ILP 005 205 604</u>		
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>
<b>A.2 Part A / Interim Status</b>		<b>.1 Correspondence</b>
<b>.1 Correspondence</b>	Y	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>
<b>.2 Notification and Acknowledgment</b>	Y	<b>C.1 Compliance - (Inspection Reports)</b>
<b>.3 Part A Application and Amendments</b>	Y	<b>C.2 Compliance/Enforcement</b>
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>		<b>.1 Land Disposal Restriction Notifications</b>
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>
<b>.6 Annual and Biennial Reports</b>		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>
<b>A.3 Groundwater Monitoring</b>	Y	<b>D.1 Corrective Action/Facility Assessment</b>
<b>.1 Correspondence</b>	Y	<b>.1 RFA Correspondence</b>
<b>.2 Reports</b>	Y	<b>.2 Background Reports, Supporting Docs and Studies</b>
<b>A.4 Closure/Post Closure</b>	Y	<b>.3 State Prelim. Investigation Memos</b>
<b>.1 Correspondence</b>	Y	<b>.4 RFA Reports</b>
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>	Y	<b>D. 2 Corrective Action/Facility Investigation</b>
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>

*Total -1*

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		<b>D.5 Corrective Action/Enforcement</b>	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		<b>D.6 Environmental Indicator Determinations</b>	
<b>D.3 Corrective Action/Remediation Study</b>		.1 Forms/Checklists	
.1 CMS Correspondence		<b>E. Boilers and Industrial Furnaces (BIF)</b>	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		<b>F Imagery/Special Studies</b> (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	X
.5 Stabilization		<b>G.1 Risk Assessment</b>	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
<b>D.4 Corrective Action Remediation Implementation</b>		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual folders per schedule.







Please refer to the instructions for filling this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

AUG 07 1995

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification  
(Complete item C)

C. Installation's EPA ID Number

I L D 0 0 5 2 0 5 6 0 4

## II. Name of Installation (Include company and specific site name)

R E X A M M E D I C A L P A C K A G I N G

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1 9 1 9 S O U T H B U T T E R F I E L D R O A D

Street (Continued)

City or Town

M U N D E L E I N I L 6 0 0 6 0 - 9 7 3 5

County Code

County Name

L A K E

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

S A M E

City or Town

State

Zip Code

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

R A C H K E

(First)

T I M O T H Y

Job Title

P L A N T M A N A G E R

Phone Number (Area Code and Number)

7 0 8 - 3 6 2 - 9 0 0 0

## VI. Installation Contact Address (See Instructions)

A. Contact Address  
Location Mailing Other☒

B. Street or P.O. Box

City or Town

State

Zip Code

## VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

R E X A M I N C .

Street, P.O. Box, or Route Number

4 2 0 1 C O N G R E S S S T R E E T S T E 3 4 0

City or Town

State

Zip Code

C H A R L O T T E N C 2 8 2 0 9 -

Phone Number (Area Code and Number)

7 0 4 - 5 5 1 - 1 5 0 0

B. Land Type

☐

C. Owner Type

☐

D. Change of Owner Indicator

☐☒☐

(Date Changed) Month Day Year

3 4 0

097150003

RC ENTRY AUG 22 1995

RECEIVED  
AUG 07 1995  
EPA/DLP



REXAM MEDICAL PACKAGING

ID - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

## A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)

2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

## Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see Instructions.

## 4. Hazardous Waste Fuel

- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace

## 1. Smelter Deferral

- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)

- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace

- ☐ 5. Underground Injection Control

## B. Used Oil Recycling Activity

## 1. Used Oil Fuel Marketer

- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

## 2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)

- ☐ a. Utility Boiler
- ☐ b. Industrial Boiler
- ☐ c. Industrial Furnace

## 3. Used Oil Transporter - Indicate Type(s) of Activity(ies)

- ☐ a. Transporter
- ☐ b. Transfer Facility

## 4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)

- ☐ a. Process
- ☐ b. Re-refine

## IX. Description of Hazardous Wastes (Use additional sheets if necessary)

## A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s)) ☒ D 0 3 5

## B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1
U I S A
7

2
U 2 2 0
8

3
9

4
10

5
11

6
12

## C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See Instructions.)

1

2

3

4

5

6

## X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Timothy J. Rachke

Name and Official Title (Type or print)

Timothy Rachke  
Plant Manager

Date Signed

7/31/95

## XI. Comments

This revised notification form is provided to notify ILEPA of the change in facility name.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)





U.S. ENVIRONMENTAL PROTECTION AGENCY

## NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

ILD005205604

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

TOWER PRODUCTS INC  
1212 S BUTTERFIELD RD  
MUNDELEIN, IL 60060

III. LOCATION OF INSTALLATION

1919 S BUTTERFIELD RD  
MUNDELEIN, IL 60060

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

000034 AUG 14 80

## FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., &amp; day)

F I L D 0 0 5 2 0 5 6 0 4

A

800813

## I. NAME OF INSTALLATION

TOWER PRODUCTS INC

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 1919 S BUTTERFIELD ROAD

CITY OR TOWN

4 MUNDELEIN

ST.

ZIP CODE

IL 60060

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 1919 S BUTTERFIELD ROAD

CITY OR TOWN

6 MUNDELEIN

ST.

ZIP CODE

IL 60060

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

2 STAHL FLOYD

BUYER

312-362-9000

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 PUBLIC HELD COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL  
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD005205604

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



5	W	1140052056005	1
1	2	13	14

# IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F003	2 F005	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

- ☐ 1. IGNITABLE (D001)
 ☐ 2. CORROSIVE (D002)
 ☐ 3. REACTIVE (D003)
 ☒ 4. TOXIC (D006)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE Michael Weaver	NAME & OFFICIAL TITLE (type or print) DISTRIBUTION SUPERVISOR	DATE SIGNED 8-8-80
-----------------------------	--	-----------------------

1140052056005
---------------









2-Ethoxyethanol	2.8	NA
Ethyl acetate	6.3	NA
Ethyl benzene	0.7	0.002
Methanol	3.5	1.0
Methylene chloride	0.005 & Mixture 1	0.005
Naphthalene	0.25	0.01
Pyrene	0.21	0.0027
Toluene	1.0	0.002
Trichloroethene	0.005 & Mixture 1	0.0012
Trichlorofluoromethane	2.1	0.005
Vinyl chloride	0.002 & Mixture 1	0.0018
Xylene	10.	0.005
Total Carcinogenic PNAs	0.0002	
Benzo(a)anthracene		0.00013
Benzo(a)pyrene		0.00023
Benzo(b)fluoranthene		0.00018
Benzo(k)fluoranthene		0.00017
Chrysene		0.0015
Dibenzo(a,h)anthracene		0.0003
Indeno(1,2,3-c,d)pyrene		0.00043
Total Non-Carcinogenic PNAs	0.21	
Acenaphthylene		0.010
Benzo(g,h,i)perylene		0.00076
Phenanthrene		0.0064

ADL = Acceptable Detection Limit, lowest Practical Quantitation Limit (PQL) as defined in SW846.

PNAs = Polynuclear Aromatics

Mixture 1: In addition to meeting the individual Class I groundwater objectives identified in the above table, the following equation must be satisfied to protect against liver tumors.





$$\frac{\text{Bis(2-ethylhexyl)Phthalate}}{0.004 \text{ mg/l}} + \frac{\text{Trichloroethene}}{0.005 \text{ mg/l}} + \frac{\text{Vinyl chloride}}{0.002 \text{ mg/l}} < 1.0$$

Mixture 2: In addition to meeting the individual Class I groundwater objectives identified in the above table, the following equation must be satisfied to protect against liver toxicity.

$$\frac{1,1\text{-Dichloroethylene}}{0.007 \text{ mg/l}} + \frac{\text{cis-1,2-Dichloroethylene}}{0.07 \text{ mg/l}} + \frac{\text{trans-1,2-Dichloroethylene}}{0.1 \text{ mg/l}} < 1.0$$

#### Soil Cleanup Objectives

Parameter	Objective (mg/kg)	ADL (mg/kg)
Acetone	0.7	0.1
Benzene	0.005	0.002
Bis(2-ethylhexyl)phthalate	0.08	0.66
2-Butanone	0.35	0.01
o-Cresol	0.35	0.66
1,1-Dichloroethane	0.7	0.0007
1,1-Dichloroethylene	0.007	0.0013
cis-1,2-Dichloroethylene	0.07	0.005
trans-1,2-Dichloroethylene	0.1	0.001
2-Ethoxyethanol	2.8	NA
Ethyl acetate	6.3	NA
Ethyl benzene	0.7	0.002
Methanol	3.5	1.0
Methylene chloride	0.005	0.005
Naphthalene	0.25	0.66
Pyrene	4.2	0.18
Toluene	1.0	0.002
Trichloroethene	0.005	0.0012





Page 4

Trichlorofluoromethane	2.1	0.005
Vinyl chloride	0.002	0.0018
Xylene	10.	0.005
Total Carcinogenic PNAs	0.004	
Benzo(a)anthracene		0.0087
Benzo(a)pyrene		0.015
Benzo(b)fluoranthene		0.011
Benzo(k)fluoranthene		0.011
Chrysene		0.100
Dibenzo(a,h)anthracene		0.020
Indeno(1,2,3-c,d)pyrene		0.029
Total Non-Carcinogenic PNAs	4.2	
Acenaphthylene		0.660
Benzo(g,h,i)perylene		0.051
Phenanthrene		0.660

All soil and groundwater samples around the hazardous waste storage tank (S02) are required to have each of the above list of parameters identified using methods 8240 and 8270 of SW-846 third edition.

2. Closure activities must be completed by November 1, 1991. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within sixty (60) days after closure, or by January 1, 1992.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.







Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. The waste manifest numbers.
- d. Copies of the waste manifests.
- e. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
- f. A chronological summary of closure activities and the cost involved.
- g. Color photo documentation of closure. Document conditions before, during and after closure.
- h. Tests performed, methods, and result for both soil and groundwater.
- i. Locations of all samples on a scaled drawing, with samples associated with a number for evaluation.
- j. A description on the use of roll off boxes or containers during analysis.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #24  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

3. Sampling in soils is required to determine the vertical and lateral extent of contamination. This area must include the waste pipeline which drained into the tank. Any volatile samples taken for laboratory analysis must be collected according to attachment seven of the Agency's Closure Plan Instruction Guide.





The methods by which all samples must be analyzed remains 8240 (volatiles), and 8270 (semi-volatiles) of SW-846 third edition. These constituents identified in the cleanup objectives must be included in each analytical result. If additional parameters are found in the analysis the constituent must be identified along with their concentration(s) to the Agency so that a cleanup level can be set.

If the extent of contamination results in contacting the upper groundwater interface then those cleanup objectives identified above for groundwater will be required in that area of closure as well.

4. Any soil removed during the sampling program or tank removal prior to a hazardous waste determination being made must be handled as a hazardous waste, and stored appropriately.

The use of OVA flame ionization detector (FID) to determine whether excavated soil is contaminated is not as reliable as that of analysis of samples prior to removal of the soil. If soil is removed and checked with an OVA in this manner, and analysis shows that the soil is contaminated then all of the soil associated in that roll off box will be considered a hazardous waste. Any stock piling of that material would then have produced a non-permitted hazardous waste pile requiring a RCRA closure plan.

5. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
6. Baxter must submit a revised closure plan addressing remediation of the soil and if necessary groundwater contamination by August 1, 1991. Results of additional soil sampling results, and a scale drawing of their location is required in this submittal. If groundwater monitoring wells are installed, the schematic cross-sections of all wells installed, narrative of each installation procedure, well logs, groundwater levels, and analytical results are required in this revised plan. This plan must address proposed remediation technologies which Baxter plans to implement, in order to clean close this area.
7. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.







8. All samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with the latest edition of SW-846 and Attachment 7 to this Agency's closure plan instruction package. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the latest edition of SW-846.
9. If clean closure cannot be achieved pursuant to 35 IAC 725.297a) then a modified closure plan and a post-closure plan prepared pursuant to 35 IAC Section 725.297b) must be submitted to the Agency for review and approval within 60 days of such a determination.
10. 35 IAC 721.131 F001 through F005 wastes must be disposed in accordance with 35 IAC Part 728.
11. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.
12. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).
13. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Agency by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. Additional information and appropriate report forms may be obtained from the Agency by contacting:

Facility Reporting Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
P.O. Box 19276  
Springfield, Illinois 62794-9276







Page 8

Should you have any questions regarding this matter, please contact T.E. Fitzgerald at 217/782-6762.

Very truly yours,

*Lawrence W Eastep by me*

Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:TEF:dls/0736q/56-61

Attachment

cc: Maywood Region  
Division File - RCRA Closure  
Groundwater Technology, Inc., P.E.  
USEPA Region V -- George Hamper  
Enforcement  
T.E. Fitzgerald - RCRA Permits





ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-535-M-1

The hazardous waste management S02 Unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Date

TEF:dls/0736q/64





New Owner

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only 0971150003

Form Approved, OMB No. 2050-0028 Expires 9-30-96  
GSA No. 0246-EPA-OT

Please refer to the instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

MAR 21 1994

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification  
(Complete Item C)

C. Installation's EPA ID Number

I L D O O 5 2 0 5 6 0 4

## II. Name of Installation (Include company and specific site name)

D R G - T O W E R

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1 9 1 9 S O U T H B U T T E R F I E L D R O A D

Street (Continued)

City or Town

M U N D E L E I N

State

Zip Code

I L

6 0 0 6 0 - 9 7 3 5

County Code

County Name

L A K E

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

S A M E

City or Town

State

Zip Code

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

R A C H K E

T I M O T H Y

Job Title

Phone Number (Area Code and Number)

P L A N T M A N A G E R

7 0 8 - 3 6 2 - 9 0 0 0

## VI. Installation Contact Address (See Instructions)

A. Contact Address  
Location Mailing Other

B. Street or P.O. Box

☒☐☐

City or Town

State

Zip Code

## VII. Ownership (See Instructions)

### A. Name of Installation's Legal Owner

R E X H A M I N C .

Street, P.O. Box, or Route Number

4 2 0 1 C O N G R E S S S T R E E T S U I T E 3 4 0

City or Town

State

Zip Code

C H A R L O T T E

N C

2 8 2 0 9 -

Phone Number (Area Code and Number)

7 0 4 - 5 5 1 - 1 5 0 0

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

P

P

Yes

X

No

Month

Day

Year

0 5 0 1 9 3



Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

ID - For Official Use Only

**VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)**

A. Hazardous Waste Activity		B. Used Oil Recycling Activities
<p>1. Generator (See Instructions)</p> <p><input checked="" type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input type="checkbox"/> b. 100 to 1000 kg/mo (200-2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify _____</p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see instructions.</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter/Refinery</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Used Oil Fuel Marketer</p> <p><input type="checkbox"/> a. Marketer Directs Shipment of Used Oil to Off-Specification Burner</p> <p><input type="checkbox"/> b. Marketer Who First Claims the Used Oil Meets the Specifications</p> <p>2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)</p> <p><input type="checkbox"/> a. Utility Boiler</p> <p><input type="checkbox"/> b. Industrial Boiler</p> <p><input type="checkbox"/> c. Industrial Furnace</p> <p>3. Used Oil Transporter - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Transporter</p> <p><input type="checkbox"/> b. Transfer Facility</p> <p>4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)</p> <p><input type="checkbox"/> a. Process</p> <p><input type="checkbox"/> b. Re-refine</p>

**IX. Description of Hazardous Wastes (Use additional sheets if necessary)**

**A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)**

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> D 0 3 5

**B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)**


1 U 1 5 9	2 U 2 2 0	3 F 0 0 5	4	5	6
7	8	9	10	11	12

**C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See Instructions.)**

1	2	3	4	5	6
---	---	---	---	---	---

**X. Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature 	Name and Official Title (Type or print) Timothy Rachke Plant Manager	Date Signed 3/7/94
--	--	-----------------------

**XI. Comments**

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)







to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions regarding this matter, please contact James K. Moore, P.E. at 217/524-3295.

Sincerely,

A handwritten signature in cursive script, reading "Joyce L. Munie".

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

JLM:JKM/mls/041961s.doc

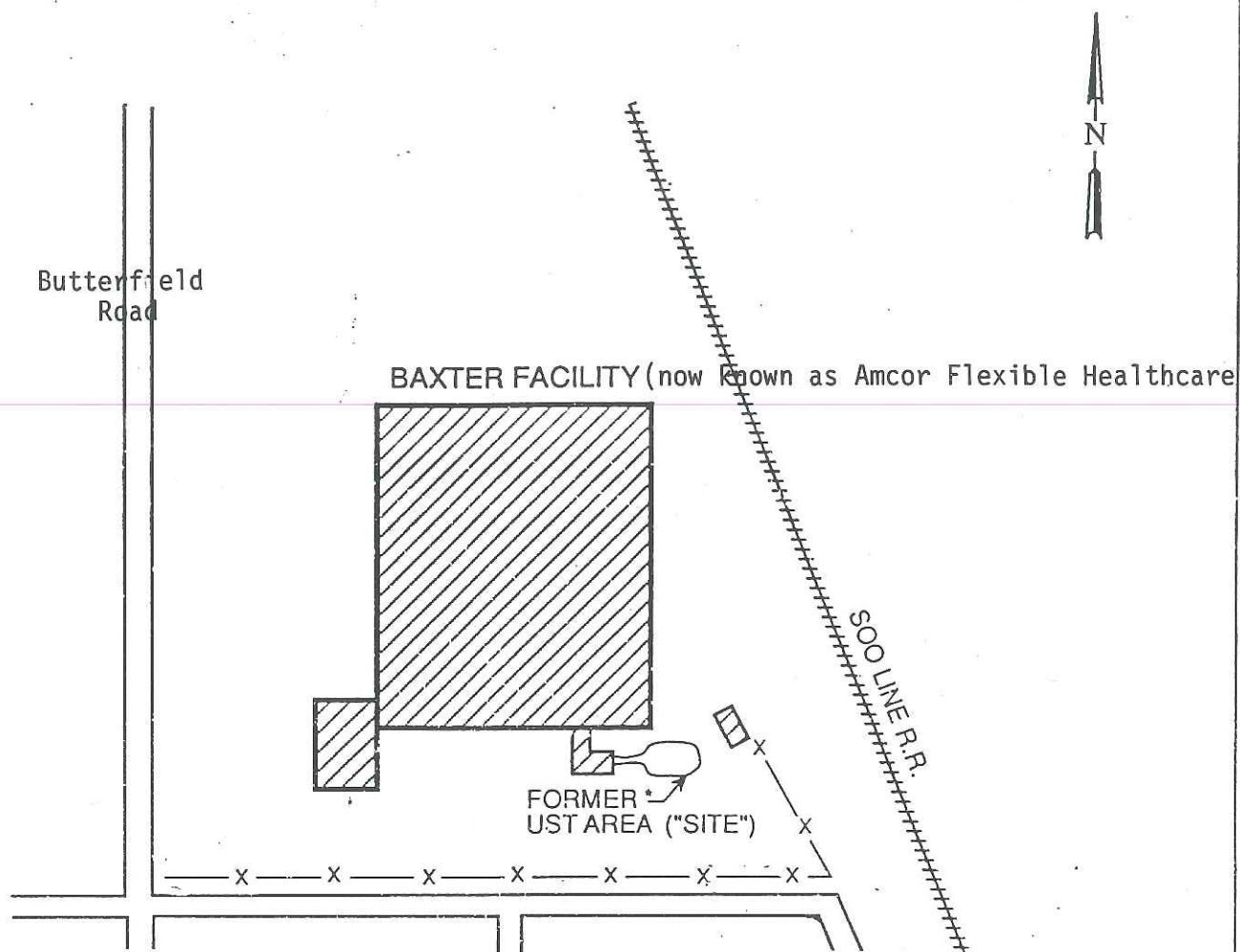
JKM

Attachments: Site Layout Map

cc: USEPA Region V







Site Layout Map  
0971150003  
Log No. C-535

0' 100' 200'  
Approximate Scale in Feet



**D. Corrective  
Action**





**Re: Fw: U.S. EPA request (EPA ID# ILD 005 205 604)- PLEASE RESPOND!**

**Dennis.Coil to: KathleenA Miller**

**09/20/2010 11:46 AM**

**History:** This message has been replied to.

Kathleen:

I have gotten a copy of a Phase I survey that was completed on the Mundelein facility in June of 2003. According to this report there was soil sampling and groundwater sampling associated with the removal of the so called "imploded" tank and there was some information on SWMU 6. I have included the information from this report in the attachment below for your review.

Thanks,  
Dennis Coil  
Director-OHSE  
Amcor Flexibles Americas & Medical Europe

(See attached file: SKMBT\_42010092009000.pdf.zip)

Thanks,  
Dennis t

Miller.KathleenA@  
epamail.epa.gov

09/10/2010 09:01  
AM

dennis.coil@amcor.com

To

cc

Subject

Fw: U.S. EPA request (EPA ID# ILD  
005 205 604)- PLEASE RESPOND!

To Mr. Coil:

I sent you an email on 8/9/10 regarding our request for updated information on Amcor Flexibles. See email below.

If you are unable to answer the specific questions listed below, please provide our office with information regarding the current activities of your facility. Perhaps your facility has worked with the state, IEPA on remediation activities?

I am a summer intern with the EPA and will be leaving on 9/24/10. I will



make a note in the file for the next intern to follow up if I don't hear back from you by that time.  
Thank you for your cooperation.

Kathleen Miller  
Environmental Protection Specialist  
RCRA Corrective Action  
U.S. EPA Region 5  
312-886-6761  
Miller.KathleenA@epa.gov  
----- Forwarded by KathleenA Miller/R5/USEPA/US on 09/10/2010 08:54 AM  
-----

From: Kathleen Miller/R5/USEPA/US  
To: dennis.coil@amcor.com  
Date: 08/09/2010 03:41 PM  
Subject: U.S. EPA request for updated records (EPA ID# ILD 005 205 604)

To Mr. Coil:

Per our phone conversation today, I am emailing you our request for updated records on Amcor Flexibles, Inc., EPA ID# ILD 005 205 604. You asked that I email you with our specific requests for records. We have not received any updated information since the Preliminary Assessment Visual Site Inspection Report (PAVSI) was conducted in 1998. As you can imagine, our information for this facility is pretty outdated. The PAVSI report contained recommendations for your facility. Do you know if any of the following recommendations were addressed?

1) AOC A (Current and Former Product Underground Storage Tank (UST) area. An imploded tank was removed and groundwater analysis indicated no elevated levels of contaminants however no soil sampling was done at the time. Do you know if any soil sampling has been conducted at this area since 1998? If so, may be have a copy of the report?

2) SWMU 6 (Former Product & Hazardous Waste Storage Tank Area). The unit was removed as part of an IEPA-approved RCRA closure plan however we have no record that clean closure was completed for this unit. If there has been RCRA closure, did you receive an approval letter from the state? If so, may we have a copy?

Any updated information on the current activity of this facility, would be greatly appreciated.  
Thank you for your assistance!

Kathleen Miller  
Environmental Protection Specialist  
RCRA Corrective Action  
U.S. EPA Region 5  
77 W. Jackson Blvd. M/S LU-9J  
Chicago, IL 60604  
312-886-6761  
Miller.KathleenA@epa.gov

Phase I survey - June 2003

**ENVISION  
ENVIRONMENTAL, INC.**

**Exterior Areas:**

- Soil Mound – No detailed information on the source of the fill used to construct this mound was provided to ENVISION. SDI Consultants, Ltd, who oversaw the construction of the mound, and Lake County Grading Company, who carried out the construction, should be contacted to determine the source of the fill material, as well as any additional information pertaining to the construction of the mound.
- Current and Former Underground Storage Tanks - Outside Ink Room – Two (2) USTs (Tank #2 and Tank #3) currently exist adjacent to the southern employee entrance outside of the Ink Room. The USTs currently store acetone and 1090 Blend (n-propyl acetate and n-propyl alcohol). The USTs have 2,000-gallon capacities and are reportedly in compliance with federal and state regulations. The USTs are direct fill with vent pipes secured to the southern facility building wall. The concrete pad that covers the USTs extends to the west, where a UST (Tank #1) previously existed until it was removed in 1995. Records indicated that this previous UST formerly contained MEK or IPA. One (1) existing groundwater monitoring well was observed in the mulch area at the northeast corner of the USTs. The well was constructed of PVC material and was 2-inches in diameter. Groundwater was present in the well at approximately 2- to 3-feet below ground surface. Three (3) USTs previously existed at this location. These USTs had 1,000-gallon capacities and were installed when the building was first constructed in 1970. These USTs were constructed of single-wall steel and contained isopropyl alcohol (IPA) in two (2) of the tanks. The third tank was reportedly used as a spill tank, which contained a mixture of the two (2) solvents and various inks. These USTs were removed in 1987 and replaced with the three (3) 2,000-gallon capacity USTs constructed of double-wall construction (Tanks #1, #2, and #3). As mentioned, Tank #1 contained MEK or IPA, Tank #2 initially contained n-propanol, and Tank #3 initially contained IPA. As part of the subsurface evaluation during the removal of the 1,000-gallon USTs in 1987 by ERM-North Central Inc., the soil was screened with a flame ionization detector (FID) to check for the presence of organic vapors. Evidence of soil contamination was reportedly observed in the excavation. Contaminated soil was excavated and stockpiled onsite in a thin layer on plastic sheeting on the parking lot to promote volatilization of the alcohols through ambient temperature and wind actions. The soil was then loaded onto a dumptruck and transported to Trouble's Dump at Highway 21 and Aptakisic Road.

Reportedly, in January 1993, Tank #1 was determined to have "imploded" and the tank was removed in April 1995. According to facility personnel, the tank did not appear to be leaking. On April 29, 1993, six (6) soil borings were installed in the vicinity of the replacement USTs by CH2M Hill. Acetone was detected in soil samples collected from three (3) of the six (6) borings. The highest concentration of acetone was 29.9 ppm detected in the boring north of UST #1. MEK was detected in soil samples collected from two (2) of the six (6) borings. The highest concentration of MEK was 4.75 ppm detected in the boring west of UST #1. Methylene chloride was detected in one (1) of the six (6) soil samples collected at a concentration of 1.67 ppm in the boring north of UST #1. A



**ENVISION  
ENVIRONMENTAL, INC.**

groundwater sample was collected from the boring that was located south of UST #1. Acetone (41,700 ppb), benzoic acid (55.1 ppb), and IPA (36.6 ppb) were detected in this water sample. The soil and groundwater contamination was attributed to historic releases from the former 1,000-gallon UST systems. This was based on the current USTs having double-wall construction with interstitial monitoring; and since their installation the monitoring results had not indicated a release. In September 1993, the Site reported to the IEPA a possible overfill of 1090 blend (or MEK and IPA) from this UST area.

In March 1995, groundwater monitoring wells and soil borings were drilled under the supervision of Groundwater Technology, Inc. (GTI) around the UST basin to determine the extent of the acetone and MEK contamination detected in the soil and groundwater samples during the April 1993 investigation. Four (4) monitoring wells were installed - three (3) south of the USTs and one (1) northeast of the USTs. Soil samples were collected during the installation of the monitoring wells. The only compounds detected in the soil samples were acetone at 0.033 ppm in one (1) of the wells south of the USTs; and acetone (1.1 ppm) and MEK (1.2 ppm) in the well northeast of the USTs. Groundwater samples were collected from each of the monitoring wells. The only compounds detected above their method detection limit (MDL) were acetone (6,200 ppb) and MEK (2,000 ppb) in the well located northeast of the USTs. It should be noted that the MDL for IPA in the sample collected from this well was 12,000 ppb. The consultants stated that the maximum constituent concentrations detected in the soil and groundwater samples were below the IEPA Tier 1 or Tier 2 cleanup standards and no further action was recommended.

Soil and groundwater contamination has been confirmed in this area from historical assessments. Although a no further action recommendation was made by the Site's environmental consultants, no record of regulatory closure of the case was located during ENVISION's database search and FOIA/file review. The status of the no further action submittal should be determined.

Both the Site and State UST files appear to be incomplete and do not include some critical documentation. A number of the reports mentioned above were not found and were identified by reference only in other reports or letters of correspondence. As a result, ENVISION could not complete its evaluation of this REC. We recommend that a complete UST file (including information on existing and removed USTs) be constructed, organized and maintained onsite. This file should include Site-specific files, plus information obtained from the State files. Any missing critical information, including complete versions of reports with sample location maps, should be obtained directly from the consultants that prepared the submissions. In addition, since the existing tanks are approximately sixteen (16) years old, a review of tank release monitoring data and the latest round of soil/groundwater sampling is needed in order to determine if any additional assessment is needed in this area. Once this organization effort is complete, ENVISION can review the missing documentation and finalize its evaluation of this issue.



**ENVISION  
ENVIRONMENTAL, INC.**

- Former Underground Storage Tanks - Outside Adhesive Storage Room - In 1983, three (3) 3,000-gallon USTs were installed outside the Adhesive Storage Room at the southeastern corner of the Site building. These USTs were referred to as Tanks #4, #5, and #6. These USTs were constructed of single-wall steel. Two (2) of these tanks formerly contained toluene and MEK in 1986 and both contained MEK by 1989. The third tank was an emergency spill tank for the nearby Adhesive Storage Room and Mixing Room. These rooms contained raw materials (solvents, adhesives, and inks) as well as hazardous waste generated from the manufacturing process in 55-gallon drums and 5-gallon plastic containers. Floor drains in these rooms were connected to the emergency spill tank by underground piping. Due to its originally intended purpose and later finding that the tank contained water and regulated substances, the emergency spill tank was determined to be a hazardous waste UST, regulated by RCRA. These USTs were removed in 1990.

As part of the subsurface evaluation performed when the USTs were removed in 1990, soil samples were collected by GTI. Samples indicated elevated concentrations of polynuclear aromatic hydrocarbons (PNAs). Elevated levels of MEK and trace levels of toluene, xylenes and trichloroethene were also detected in several soil samples. Four (4) groundwater monitoring wells and one (1) soil boring were installed in this area in March 1991. Samples were analyzed for VOCs and PNAs. No VOCs were detected, except for trace levels of methylene chloride and toluene in several samples that was attributed to laboratory contamination. Trace levels of PNAs were detected in several soil samples. In 1991 and 1992, groundwater samples were collected from the four (4) monitoring wells and analyzed for PNAs and VOCs. The only VOC or PNA compounds detected in the wells were low levels of acetone in MW-1 and MW-2 in 1991 and phenanthrene in MW-1 in 1992. In an August 1993 Revised Closure Documentation Report, a risk analysis was performed on soils by CH2M Hill using USEPA guidance documents. The results indicated the risk from these constituents to be two (2) orders of magnitude below USEPA action levels. Reportedly, during a December 1993 conference call between the IEPA and the Site, the IEPA granted closure of this area with respect to groundwater monitoring, since no constituents were detected in groundwater above Class II standards.

In March 1994, the Site received a RCRA Closure Approval Letter from the IEPA pertaining to the hazardous waste tank storage area onsite. This letter stated that no further investigation or remediation was necessary in this area; however, a review for formal closure was underway. It is not clear if this letter pertains to all three (3) USTs at this location or if it applies only to the former emergency spill tank. This letter also states that the IEPA is reevaluating the closure certification submitted in August 1993 to determine if the subject hazardous waste management unit has been closed in accordance with the approved closure plan. Again, it is not clear what area this letter is referring to. It should be clarified as to which area the closure approval letter applies and the status of the mentioned IEPA reevaluation should be determined.

In October 1997, TechLaw, Inc. of Chicago, IL conducted a Preliminary Assessment/Visual Site Inspection of the Site for the USEPA Region 5. The results of the inspection are



**ENVISION  
ENVIRONMENTAL, INC.**

documented in an April 23, 1998 report. The purpose of this assessment was to identify environmental releases or potential release from solid waste management units (SWMUs) and areas of concern (AOCs) that may require corrective action by the facility. The assessment identified seven (7) SWMUs and one (1) AOC. Six (6) of the SWMUs (drum storage areas and satellite storage areas) were determined to have a low potential for release. The Former Product and Hazardous Waste UST Area (SWMU 6 – the former USTs outside of the Adhesives Storage Room at the southeast corner of the manufacturing building, Tanks #4, #5, and #6) was identified as having a high potential for a release. The only identified AOC (Current and Former Product Underground Storage Tank Area – the USTs outside the Ink Room, Tanks #1, #2 and #3) was reported to have a moderate potential for release. The IEPA reportedly had granted closure for SWMU 6, but the closure documentation was under IEPA review according to the TechLaw report. Groundwater analytical data from the Current and Former Product UST Area (the only AOC identified) did not exceed IEPA levels. However, TechLaw requested documentation of soil sampling results from this area. TechLaw indicated that without the soil data, it would be difficult to determine if contaminants are present in the soil at levels of concern. It is not known if the Site provided any soil data to TechLaw at a later time.

Soil and groundwater contamination has been confirmed in this area from historical assessments. Both the Site and State UST files appear to be incomplete and do not include some critical documentation. A number of the reports mentioned above were not found and were identified by reference only in other reports or letters of correspondence. As a result, ENVISION could not complete its evaluation of this REC. We recommend that a complete UST file (including information on existing and removed USTs) be constructed, organized and maintained onsite. This file should include Site-specific files, plus information obtained from the State files. Any missing critical information, including complete versions of reports with sample location maps, should be obtained directly from the consultants that prepared the submissions. Once this organization effort is complete, ENVISION can finalize its evaluation of this issue.

- Hazardous Waste Storage Shed – The Hazardous Waste Storage Shed is located southeast of the manufacturing building and is constructed of a poured reinforced concrete floor with concrete curbing, steel framing, and sheet metal walls and roof. The materials stored in this shed include drums of raw materials, non-hazardous waste, and hazardous waste. Fluorescent bulbs, light ballasts and spent batteries are stored in this shed (universal waste). Used U-shaped bulbs are also stored in cardboard boxes. Two (2) partially filled (3- to 4-inches) 55-gallon plastic drums containing waste antifreeze were also observed near the front entrance of the shed. These drums were staged on a wooden pallet with a box of used light ballasts and several used batteries from the emergency lights. Minor staining was observed on the concrete floor adjacent to the wooden pallet containing the waste antifreeze. In addition, two (2) empty and one (1) partially filled gasoline cans were also observed in the flammable storage cabinet.

During ENVISION's Site visit, one (1) existing groundwater monitoring well was observed in

✶ Email sent on 8/9/10 to Amcor Flexibles  
requesting updated records etc.



U.S. EPA request for updated records (EPA ID# ILD 005 205 604)

KathleenA Miller to: dennis.coil

08/09/2010 03:41 PM

To Mr. Coil:

Per our phone conversation today, I am emailing you our request for updated records on Amcor Flexibles, Inc., EPA ID# ILD 005 205 604. You asked that I email you with our specific requests for records. We have not received any updated information since the Preliminary Assessment Visual Site Inspection Report (PAVSI) was conducted in 1998. As you can imagine, our information for this facility is pretty outdated. The PAVSI report contained recommendations for your facility. Do you know if any of the following recommendations were addressed?

1) AOC A (Current and Former Product Underground Storage Tank (UST) area. An imploded tank was removed and groundwater analysis indicated no elevated levels of contaminants however no soil sampling was done at the time. *Do you know if any soil sampling has been conducted at this area since 1998? If so, may we have a copy of the report?*

2) SWMU 6 (Former Product & Hazardous Waste Storage Tank Area). The unit was removed as part of an IEPA-approved RCRA closure plan however we have no record that clean closure was completed for this unit. *If there has been RCRA closure, did you receive an approval letter from the state? If so, may we have a copy?*

Any updated information on the current activity of this facility, would be greatly appreciated.  
Thank you for your assistance!

Kathleen Miller  
Environmental Protection Specialist  
RCRA Corrective Action  
U.S. EPA Region 5  
77 W. Jackson Blvd. M/S LU-9J  
Chicago, IL 60604  
312-886-6761  
Miller.KathleenA@epa.gov





Draft



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

MEMORANDUM

DATE:

SUBJECT:

Determination of Need for an Investigation

Facility Name: Amscor Flexibles, Inc. (Rexon Medical Packaging)

EPA ID #: ILD 005 205 604

FROM:

Kathleen Miller

Kathleen Miller, Environmental Protection Specialist

TO: George Hamper, Chief, Corrective Action Section 2

I recommend the following determination regarding the need for an investigation:

☐ CA070NO Determination of Need for an Investigation-Investigation is not Necessary

Reason for Determination

- ☐ Preliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further investigation
- ☐ PA/VSI recommendations do not warrant RRB attention
- ☐ Phase 1 Environmental Site Assessment (ESA) did not recommend further investigation
- ☐ Phase 2 ESA did not recommend further investigation
- ☐ Phase 1/Phase 2 ESA recommendations do not warrant RRB attention
- ☐ Company representative asserts that the site is clean
- ☐ Not subject to corrective action
- ☐ Enrolled in other clean-up program
- ☐ PA/VSI recommendations have been implemented
- ☐ Superfund Removal
- ☐ Participating in Voluntary Remediation Program
- ☐ Completed Voluntary Remediation Program
- ☐ Superfund Remedial Action
- ☐ Superfund No Further Action Decision
- ☐ Superfund Base Relocation and Closure
- ☐ Other \_\_\_\_\_

☒ CA070YE Determination of Need for an Investigation - Investigation is Necessary

Reason for Determination

- ☐ PA/VSI recommends further investigation
- ☒ ESA recommends further investigation
- ☐ Other \_\_\_\_\_

☐ No determination can be made - More Information Needed

☐ Approved

☐ Not Approved

Signed: \_\_\_\_\_ Date: \_\_\_\_\_





**Determination: Soil sampling at UST****PA/VSİ Or RFA FILE REVIEW CHECKLIST**

Facility Name: Amcor Flexibles Healthcare (Rexam Medical Packaging) \_\_\_\_\_

EPA ID: ILD 005 205 604 \_\_\_\_\_ City: Mundelein \_\_\_\_\_ State: IL \_\_\_\_\_

Name of Reviewer: Maureen McHugh \_\_\_\_\_ Date of Review: 7/31/08 \_\_\_\_\_

1	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Is this a one folder site?
2	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there Superfund files for this site?
3	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you Read the Executive Summary?
			There are: <u>8</u> SWMUs and <u>1</u> AOCs at this site.
4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you review the regulatory history?
5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Does the facility have interim status or a permit?
			This facility is a: <u>      </u> SQG, <u>  X  </u> LQG, or <u>      </u> Less than 90 day.
6	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was the Facility closed per RCRA? RCRAInfo 380 (2004)
			If Yes, was the closure: <u>  X  </u> CC, or <u>      </u> CIP.
7	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there documented (historical) releases? Briefly describe on Page 2.
8	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSİ or RFA file, please classify this site as:

       No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

  X   Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

       More Information Needed: There is no RFA, PA/VSİ or RCRA closure information available.

## PA/VSI Or RFA FILE REVIEW CHECKLIST

### Notes

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

SWMU6- Elevated levels of methanol and 8 PNAs near the USTs. Risk was determined to be a minimum of 2 orders of magnitude below USEPA action levels and certification of closure was under review at the time of the PA/VSI. When the USTs were removed, the excavation area was lined with plastic and backfilled with the excavated soil, grade 7 sand, and gravel. It was covered with asphalt.

Twice cited for exceeding organic emissions levels

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

### PA/VSI Recommendations

Soil sampling at AOCA, the current and former product UST area. An imploded tank was removed and groundwater analysis indicated no elevated levels of contaminants but no soil sampling was done. The tanks managed virgin isopropanol, MEK, and a 1090 blend of acetate and n-propyl alcohol.

UST LUST Open incident #932847

D-8J

April 24, 1998

Ms. Patricia Brown-Derocher  
Regional Manager  
TechLaw, Inc.  
20 North Wacker Drive  
Suite 1260  
Chicago, Illinois 60606


Reference: contract No. 68-W4-00006; Work Assignment R05052

Dear Ms. Brown-Derocher:

Thank you for your April 23, 1998, letter regarding the Rexam Medical Packaging facility (ILD 005 205 604) in Mundelein, Illinois. I have read through the provided materials and have concluded that the revised submission along with the previously provided scoring sheets will constitute the final deliverable for the facility. Please provide a copy of the final report to the appropriate IEPA and facility contacts.

Do not hesitate to call me at (312) 886-0977 should you have additional questions or need additional clarification.

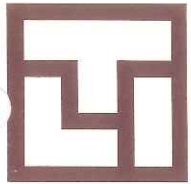
Sincerely,

  
Gerald W. Phillips  
Corrective Action Process Manager  
Waste, Pesticides and Toxics Division

cc: R. Young, TechLaw  
F. Norling, U.S. EPA







**TECHLAW INC.**

20 NORTH WACKER DRIVE, SUITE 1260, CHICAGO, IL 60606

PHONE: (312) 578-8900

FAX: (312) 578-8904

RZ2.R05052.01.ID.133

April 23, 1998

Mr. Gerald Phillips  
U.S. Environmental Protection Agency  
Region 5 D-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W4-0006; Work Assignment No. R05052; Environmental  
Priorities Initiative (EPI) Assessments; Rexam Medical Packaging, Mundelein,  
Illinois; EPA ID No. ILD005205604; PA/VSI Report; Task 04 Deliverable

Dear Mr. Phillips:

Please find enclosed the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report and  
the NCAPS Scoring Report for the above referenced facility. The total migration score on the  
NCAPS is 21.09, with a groundwater score of 36.75 and an air route score of 20.49.

Should you have any questions or require additional information, please feel free to contact me  
at (312)345-8963 or Mr. Rob Young at (312) 345-8966.

Sincerely,

Patricia Brown-Derocher  
Regional Manager

Enclosure

cc: F. Norling, EPA Region 5, w/o attachment  
W. Jordan/Central Files  
R. Young  
Chicago Central Files

c:\ehs\52\52id133.wpd







**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT  
FOR  
REXAM MEDICAL PACKAGING  
1919 SOUTH BUTTERFIELD ROAD  
MUNDELEIN, ILLINOIS  
EPA I.D. NO. ILD005205604**

**Submitted to:**

**Mr. Gerald Phillips  
U.S. Environmental Protection Agency  
Region 5 D-8J  
77 West Jackson Boulevard  
Chicago, Illinois 60604**

**Submitted by:**

**TechLaw, Inc.  
20 North Wacker Drive, Suite 1260  
Chicago, Illinois 60606**

**EPA Work Assignment No.  
Contract No.  
TechLaw WAM  
Telephone No.  
EPA WAM  
Telephone No.**

**R05052  
68-W4-0006  
Mr. Rob Young  
312/345-8966  
Mr. Gerald Phillips  
312/886-0977**

**April 23, 1998**



**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT  
FOR  
REXAM MEDICAL PACKAGING  
1919 SOUTH BUTTERFIELD ROAD  
MUNDELEIN, ILLINOIS  
EPA ID NO. ILD005205604**

**TABLE OF CONTENTS**

	Page
I. EXECUTIVE SUMMARY .....	I-1
II. SITE DESCRIPTION .....	II-1
III. SOLID WASTE MANAGEMENT UNITS .....	III-1
IV. AREAS OF CONCERN .....	IV-1
V. CONCLUSIONS .....	V-1
VI. REFERENCES .....	VI-1

**Tables**

Table 1	Solid Waste Management Units and Areas of Concern Summary .....	III-2
---------	--	-------

**Appendices**

Appendix A	Visual Site Inspection Photograph Log
Appendix B	Visual Site Inspection Field Notebooks
Appendix C	Facility Layout and SWMU/AOC Locations





## I. EXECUTIVE SUMMARY

The RCRA Facility Assessment (RFA) is the first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The purpose of the RFA is to identify environmental releases or potential releases from solid waste management units (SWMUs) and areas of concern (AOCs) that may require corrective action by the facility owner. A preliminary assessment/visual site inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at the Rexam Medical Packaging facility in Mundelein, Illinois.

A preliminary assessment (PA) of the available U.S. Environmental Protection Agency (U.S. EPA) and State of Illinois file materials was conducted to familiarize the TechLaw, Inc. (TechLaw) Team with past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes and waste management practices at the Rexam Medical Packaging facility. A Visual Site Inspection (VSI) was conducted on October 7, 1997 by a TechLaw, Inc. (TechLaw) Team to identify and characterize SWMUs and AOCs. File material was provided to the TechLaw Team during the VSI by Mr. Jim Fox, Environmental Coordinator, and Mr. Timothy Rachke, General Manager, Rexam Medical Packaging. Photographs were taken during the VSI and are documented in Appendix A. The VSI Field Notebooks are included in Appendix B, and a site map showing SWMU and AOC locations is presented in Appendix C.

The Rexam Medical Packaging facility produces a number of specialized polyethylene-based medical packaging products. The products have been developed and are manufactured in a manner which produces packaging suitable for sterilization.

A total of eight SWMUs and one AOC were identified. These are described in more detail in Sections III and IV of this report. Seven of these SWMUs are characterized as having a low potential for release.

The Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6) was identified as having a high potential for release. Soil sampling in 1992 identified elevated levels of methanol (85,400 ppb) and eight PNAs (e.g. benzo(a) anthracene: 810 ppb). According to a documented December 3, 1993 conference call between Illinois EPA (IEPA) and Rexam, IEPA reportedly granted closure for this unit with respect to groundwater monitoring, since no constituents were detected in groundwater above Class II standards. As indicated in the August 13, 1993 Revised Closure Documentation Report, a risk analysis was performed by CH2M Hill using U.S. EPA guidance documents. Results reportedly indicated the risk from these constituents to be two orders of magnitude below U.S. EPA action levels. An October 31, 1997 phone conversation with Mr. Jim Moore of IEPA indicates closure documentation is currently under review by IEPA.

Analytical results from groundwater sampling of the Current and Former Product Underground Storage Tank Area (AOC A) indicates no detectable levels of the more than 50 compounds for which the samples were reportedly tested. However, soil sampling information was not present in the file materials. Soil sampling information was requested by TechLaw, though Rexam was unable to supply any data and stated the references were likely with the previous owners of the site, Baxter Health Care. Without this information, it is difficult to determine if contaminants are present in the soil at levels of concern.



## II. SITE DESCRIPTION

The Rexam facility is located at 1919 South Butterfield Road, in a mixed use industrial and residential area in the town of Mundelein, Illinois. The site is bordered by railroad tracks to the north and east, Butterfield Road to the west, and a residential area to the south. A fence completely surrounds the facility with the exception of the main entrance which is open. Residential areas are located to the south, within 50 feet of the facility. A grammar school is located approximately 0.6 miles northwest of the facility.

The facility began operations in 1970 as DRG-Tower, Incorporated. In 1980, the facility name changed to American Converters, Inc. (a division of American Hospital Supply Corporation), then to American/Pharmaseal in 1985. The facility was then sold to Baxter Healthcare Corporation in 1986. In 1993, the facility name changed to Bowater and the facility was purchased by the current owner, Rexam Medical Packaging, in 1995.

The facility covers 13 acres and includes a 134,000 square foot manufacturing facility and parking/open areas. Contained within the building are manufacturing areas (80,000 square feet), office space (24,000 square feet) and a warehouse (30,000 square feet). Rexam also maintains a distribution center (60,000 square feet) which is approximately one-quarter mile north of the manufacturing facility.

The Rexam facility manufactures flexible packaging and other polyethylene film products which are suitable for sterilization for the medical industry. Facility operations include blown film extrusion, printing, laminating, coating, slitting, and pouch and bag making.

Polyethylene pellets are transported to the facility by rail and are placed into extruders, which form long tubular sheets of film. The film is then printed, laminated, coated and mechanically altered to generate the final product. Spent solvents are generated from both the printing and laminating processes. The printing process generates waste propanol (a wash solvent) and waste ink. The laminating process generates waste MEK (a wash solvent), waste adhesives, and waste coatings.

Waste ink and clean-up solvents (propanol, MEK) generated in the printing process are temporarily stored in 55-gallon drums in the Ink Room Satellite Storage Area (SWMU 2) during filling. They are then moved to the nearby Ink Room Temporary Storage Area (SWMU 1) where they are placed on pallets in preparation for transport to the Hazardous Waste Shed (SWMU 7). Within 24 hours, they are transported to the Hazardous Waste Storage Shed (SWMU 7) where they are stored, prior to shipment for offsite disposal.

Water-based and solvent-based waste adhesives, coatings and clean-up solvents generated in the laminating process are temporarily stored in 55-gallon drums in the Adhesives Room Satellite and Temporary Storage Area (SWMU 5). Full drums are transported to the Hazardous Waste Storage Shed (SWMU 7) within 24 hours for storage prior to offsite disposal.

Three 3,000-gallon underground storage tanks (USTs) were formerly located at this facility in the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6). Two of the USTs were used for the storage of virgin MEK, the third UST was used for the storage of waste MEK, freon, and other non-specified F005 hazardous wastes. Due to facility concerns of leaks from the USTs, the three USTs were removed in December 1990, and closure activities were conducted following an IEPA-approved closure plan. According to an October 31, 1997 phone conversation with Mr. Jim Moore of IEPA, closure documentation is currently under review by IEPA.

The hazardous waste UST formerly contained in SWMU 1 was connected by transfer piping to floor drains in the Adhesives Room Satellite and Temporary Storage Area (SWMU 5) and in the ink mixing room (product only). The soil surrounding the floor drain, transfer piping, and the hazardous waste UST contained methanol concentrations above IEPA acceptable detection limits and cleanup objectives.

Other SWMUs include a Safety Kleen Parts Washer (SWMU 4), used to clean various machine components, and a Waste Oil Storage Cabinet (SWMU 3), where waste oil from routine machine servicing is collected. General nonhazardous waste is collected throughout the facility and is placed in a dumpster prior to disposal.

#### Release History

In August 1992, soil sampling of the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6) identified elevated levels of methanol and eight PNAs. Of the eight PNAs detected above IEPA soil objectives, benzo(a) anthracene was detected at the highest level (810 ppb), nearly 100 times the IEPA objective of 8.7 ppb specified in the June 1, 1992 letter to Baxter. The maximum concentration of methanol in soil samples was 85,000 ppb, nearly 25 times the IEPA soil objective of 3,500 ppb. IEPA reportedly granted closure with respect to groundwater monitoring since no constituents were detected above Class II standards. A risk analysis was performed for methanol and PNAs, the only constituents above IEPA soil objectives. Results reportedly indicated that levels of risk were a minimum of two orders of magnitude below U.S. EPA action levels. Certification of closure documentation is currently under review by IEPA.

On January 23, 1989, the facility was cited for exceeding the permitted levels for organic emissions from the flexographic press operations. The permit was modified, a new application submitted, and the application was approved by IEPA.

On March 19, 1991, the facility was again cited for exceeding organic emissions levels

III-1 II-2



## Environmental Setting

The topography on-site is relatively flat, with areas of higher elevation along the southwestern reaches of the Rexam property. Surface drainage flows through stormwater drains into a retention pond located northwest of the Rexam manufacturing building. According to the United States Geological Survey (USGS) topographical map of the area surrounding the Rexam property, the nearest body of surface water, an intermittent stream, flows across the Rexam property approximately one-tenth of a mile to the north of the manufacturing building.

Regional geology indicates the Rexam facility lies atop Pleistocene-age sediments belonging to the Wadsworth Member of the Wedron Formation and atop bedrock of Silurian age. The Pleistocene sediments are composed of gray-clayey and silty-clayey till with low pebble, cobble and boulder content. Locally, the sediments may also contain lenses of silt.

Site geology consists of an upper layer of sand fill and/or topsoil underlain by sandy-silt or sandy-clay layers which is underlain by dense clay till. The fill at the site ranges from 1 to 10 feet thick with the greatest thickness occurring in the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6). The underlying sandy-silt or sandy-clay layers vary in thickness from 4 to 11 feet. The underlying dense clay till was encountered at depths of 3 to 13 feet and occurs in 1 to 10-foot thicknesses. The deepest boring found in the file material was 15 feet below ground surface (bgs).

Groundwater occurs at a depth of approximately 4 feet bgs and is not utilized as a source of drinking water and would not be considered a drinking water aquifer by IEPA under 35 IAC 620 Subpart B. Groundwater wells in the area produce from a deeper aquifer, with the nearest being approximately 500 feet east of the Rexam property.

## Regulatory History

In 1985, the facility was cited by IEPA for operating space heaters, flexographic presses and laminators/coaters without a permit. This deficiency was corrected in July of 1986.

On January 23, 1989, the facility was cited for exceeding the organic emission level created for the flexographic press operation permit. The permit was modified, a revised application was submitted, and the application was approved by IEPA.

On April 9, 1990, Baxter Healthcare Corporation submitted a closure plan for the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6). The closure plan was part of a pro-active nationwide program instituted by Baxter to remove all of their single-walled USTs.



On April 18, 1990, IEPA requested a determination as to whether releases had occurred from the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6).

On April 20, 1990, Baxter issued a public notice for closure for the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6).

On July 10, 1990, IEPA accepted the final closure plan subject to several conditions and modifications.

On March 19, 1991, the facility was again cited for exceeding organic emissions levels.

On May 28, 1992, the groundwater portion of the February 28, 1992, Closure Plan was conditionally approved by the IEPA Groundwater Unit. On June 1, 1992, the Closure Plan Modification was conditionally approved by IEPA.

On March 1, 1993, IEPA disapproved the November 25, 1992 Closure Documentation Report for the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6).

On August 13, 1993, Baxter issued a Revised Closure Documentation Report to IEPA for the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6). According to the report, the groundwater in the shallow aquifer appeared to qualify as Class II groundwater. As a result, CH2M Hill contended that PNAs present in the groundwater occurred below Class II limits and that no further action was necessary. They also stated that the presence of PNAs was due to background (background samples submitted) or other conditions since the facility never utilized PNA-containing materials. A risk analysis was also included for soil constituents exceeding IEPA objectives, including PNAs. U.S. EPA guidance documents were utilized and results indicated that levels of risk were a minimum two orders of magnitude below U.S. EPA levels.

On November 16, 1993, IEPA disapproved the 1993 Revised Closure Documentation Report, citing deficiencies involving the presence of PNAs in SWMU 6.

On December 3, 1993, Baxter discussed PNA related issues with IEPA staff during a conference call. In a letter from IEPA dated December 9, 1993, Baxter received confirmation that the onsite presence of PNAs was the only unresolved issue with regard to clean closure of the site.

As indicated in the March 11, 1994 letter to Baxter, IEPA stated that a review of available closure information indicated that no further investigation or remediation appeared to be necessary for SWMU 6. However, this area is currently under review for formal closure by IEPA.

Stormwater is regulated under NPDES Permit No. ILR00036. No other references to surface water are present in the available file material. There are no records of stormwater permit violations or a date of issuance in the available file materials.

Air emissions are regulated under Operating Permit No. 86070075. The available file materials indicate the last permit was issued (renewed) by IEPA on February 28, 1996. The permit expired in June 1996, though, according to Mr. Fox, it has reportedly been renewed. The air permit is necessary because the facility operates a catalytic oxidizer to control emissions from flexographic processes as well as a catalytic afterburner for lamination operations.

On January 25, 1996, the most recent IEPA inspection report present in the file materials, no violations were recorded.





### III. SOLID WASTE MANAGEMENT UNITS

A total of seven solid waste management units (SWMUs) and one area of concern (AOC) was identified during the PA and VSI. The SWMUs and the AOC are listed in Table 1 on the following page.

This section presents descriptions of the SWMUs identified during the PA and VSI at the Rexam Medical Packaging facility and Section IV provides a description of the AOC. Photograph numbers correspond to those presented in the Photograph Log in Appendix A.



**TABLE 1****SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN  
REXAM MEDICAL PACKAGING**

<b>SWMU/AOC</b>	<b>Description</b>	<b>Release Potential</b>
1	Ink Room Temporary Storage Area	Low
2	Ink Room Satellite Storage Area	Low
3	Waste Oil Storage Cabinet	Low
4	Safety Kleen Parts Washer	Low
5	Adhesives Room Satellite and Temporary Storage Area	Low
6	Former Product and Hazardous Waste Underground Storage Tank Area	High
7	Hazardous Waste Storage Shed	Low
A	Current and Former Product Underground Storage Tank Area	Moderate





**SWMU 1 - Ink Room Temporary Storage Area**

**Report Photograph No(s):** 1

**Log Book Photograph No(s):** 1-2

**Period of Operation:** 1970 to present

**Location:** This unit is located outside of the Ink Room Satellite Storage Area (SWMU 2) in the southwest corner of the Rexam Manufacturing Building.

**Physical Description:** This unit consists of 55-gallon steel drums containing waste solvent-based and water-based inks and dyne wastes generated by the printing process. The drums are initially filled in the Ink Room Satellite Storage Area (SWMU 2) and are then transferred to this area. The drums are stored on wooden pallets on the concrete floor of the Rexam Manufacturing Building for a maximum of 24 hours before being transported to the outdoor Hazardous Waste Storage Shed (SWMU 7). Flammable waste drums are grounded.

**Wastes Managed:** This unit manages 55-gallon steel drums containing waste solvent-based and waste water-based inks and dyne generated by the printing process.

**History of Releases:** No evidence of releases was identified in U.S. EPA or IEPA file materials or during the VSI.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low ( X )

**Conclusions:** No further action is recommended for this SWMU since no evidence of releases or probability of releases were identified during the PA/VSI.

## **SWMU 2 - Ink Room Satellite Storage Area**

**Report Photograph No(s):** 2

**Log Book Photograph No(s):** 1-3

**Period of Operation:** 1970 to present

**Location:** This area is located on the concrete floor of the southwest corner of the Rexam Manufacturing Building.

**Physical Description:** This area consists of numerous 5-gallon sealed product containers, stored in shelving units, and approximately three 55-gallon steel drums containing waste inks, which are stored on the concrete floor of the Manufacturing Building. Product is also stored in 55-gallon steel drums in this area (three drums). The waste drums contain waste solvent-based ink (one drum), waste water-based ink (one drum), and dyne waste (one drum) used to test the surface tension of various products both on the production line and in the lab. After accumulation, the drums are moved to the Ink Room Temporary Storage Area (SWMU 1).

The storage area is sunken by four to six inches and there is a ramp to the entrance. Floor drains are absent and the floor exhibits no major cracks. At the time of the VSI, no major spills/released were evident.

**Wastes Managed:** This unit manages 55-gallon steel drums of waste solvent-based and waste water-based inks, and dyne wastes.

**History of Releases:** No evidence of releases was identified in U.S. EPA or IEPA file materials or during the VSI.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low ( X )

**Conclusions:** No further action is recommended for this SWMU since no evidence of releases or probability of releases were identified during the PA/VSI.



### **SWMU 3 - Waste Oil Storage Cabinet**

**Report Photograph No(s):** 3

**Log Book Photograph No(s):** 1-5

**Period of Operation:** 1970 to present

**Location:** This storage cabinet is located in the maintenance/machine shop in the southeast portion of the Rexam Manufacturing Building.

**Physical Description:** This unit consists of a lockable storage cabinet approximately five feet tall, five feet wide, and three feet deep. At the time of the VSI, the cabinet contained one 55-gallon steel waste oil collection drum, approximately 12 assorted small oil transfer containers used to collect and dispense oil, and approximately six 5-gallon buckets also used for waste oil transfer.

**Wastes Managed:** The cabinet manages waste oil generated during the routine servicing of production machinery. Waste oil is collected for removal/disposal by EMCO.

**History of Releases:** No evidence of releases was identified in U.S. EPA or IEPA file materials or during the VSI.

**Potential for Past/present Release:**

High (   )  
Moderate (   )  
Low ( X )

**Conclusions:** No further action is recommended for this SWMU since no evidence of releases or probability of releases were identified during the PA/VSI.

**SWMU 4 - Safety Kleen Parts Washer**

**Report Photograph No(s):** 4

**Log Book Photograph No(s):** 1-6

**Period of Operation:** 1970 to present

**Location:** This unit is located in the maintenance/machine shop in the southeast portion of the Rexam Manufacturing Building.

**Physical Description:** This unit consists of a parts washer solvent drum, basin, and recirculating pump located on the concrete floor of the Manufacturing Building. At the time of the VSI, there concrete floor appeared to be in good condition and there were no signs of spills/releases.

The parts washer is used to clean various machine components from throughout the plant. The Safety Kleen Company manages this unit with a usual service interval of three months.

**Wastes Managed:** The parts washer manages a non-hazardous cleaning solvent (since 1995) used in the cleaning of various machine components. Prior to 1995, a naphtha-based solvent was used.

**History of Releases:** No evidence of releases was identified in U.S. EPA or IEPA file materials or during the VSI.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low ( X )

**Conclusions:** No further action is recommended for this SWMU since no evidence of releases or probability of releases were identified during the PA/VSI.

## **SWMU 5 - Adhesives Room Satellite and Temporary Storage Area**

**Report Photograph No(s):** 5 and 6

**Log Book Photograph No(s):** 1-7 and 1-8

**Period of Operation:** 1970 to present

**Location:** This unit is located in the southeast corner of the Rexam Manufacturing Building.

**Physical Description:** This unit consists of approximately eight to ten 55-gallon drums and approximately 15 5-gallon containers of water-based and solvent-based waste adhesives, coatings and clean-up solvents generated in the laminating process. Product is also stored in this area. Flammable wastes and products are grounded during storage. After a drum is completely filled, it is transported to the Hazardous Waste Storage Shed (SWMU 7) by forklift within 24 hours. During the VSI, waste drums and product drums were not separated which created difficulty in identifying the contents of the drums.

**Wastes Managed:** This unit manages 55-gallon drums and 5-gallon containers of water-based and solvent-based waste adhesives, coatings and clean-up solvents generated in the laminating process.

**History of Releases:** This unit previously contained a floor drain which was connected, via transfer piping, to the former hazardous waste underground storage tank located in SWMU 6. The drain area, transfer piping area, and the former hazardous waste underground storage tank were determined to have leaked, all of which are included in SWMU 6. The floor drain was reportedly plugged and was not visible during the VSI. In addition, no evidence of spills or releases were visible.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low ( X )

**Conclusions:** This unit has no history of releases, with the exception of the UST formerly connected to the floor drain from this unit which has a documented release history. The drain area, transfer piping area, and the former hazardous waste underground storage tank are all included in SWMU 6. Since these components are considered as part of SWMU 6, and no signs of major spills/releases were present at the time of the VSI, the potential for release is low.



## **SWMU 6 - Former Product and Hazardous Waste Storage Tank Area**

**Report Photograph No(s):** 7

**Log Book Photograph No(s):** 1-9

**Period of Operation:** 1970 to 1990

**Location:** This unit was located approximately 20 feet south of the southwest corner of the Rexam Manufacturing Building.

**Physical Description:** This unit includes the former hazardous waste underground storage tank and two product tanks. The hazardous waste tank had a 3,000-gallon capacity and was connected to floor drains by drain lines in the Adhesives Room Satellite and Temporary Storage Area (SWMU 5) and the ink mixing room. Mr. Fox stated that these drain lines were believed to have been plugged for a number of years by the adhesives they managed. The unit received spilled product and waste from the aforementioned areas. The two product tanks had a 3,000 gallon capacity and were used to store virgin MEK.

Sampling conducted in the vicinity of this unit indicated that several soil constituents exceeded IEPA levels specified in the June 1, 1992 letter to Baxter. IEPA levels for the soil constituents included 3,500 ppb for methanol, and 0.004 mg/kg for carcinogenic PNAs, including 8.7 ppb for benzo(a) anthracene. The contamination is apparently linked to the former hazardous waste underground storage tank and the related transfer lines and floor drain which were located in this area. Constituents exceeding IEPA levels included methanol (85,400 ppb) and eight PNAs (e.g. benzo(a) anthracene: 810 ppb).

All three tanks were removed in 1990, due to concerns of age and the potential for further releases. As the tanks were removed, impacted soil from the excavation was temporarily stockpiled over the remaining tanks. Following tank removal, the excavated soil was returned to the excavation from which it was removed. The excavation was then lined with plastic and backfilled with grade seven sand and pea gravel. The area was later covered with asphalt. As indicated in a 1993 letter from IEPA, the only remaining concern was the presence of the PNAs.

According to the 1993 Revised Closure Documentation Report, the groundwater in the shallow aquifer qualifies as Class II groundwater. As a result, the facility contends that PNAs present in the groundwater require no further action with regard to corrective action. In addition, Rexam representatives insist that PNAs-containing materials were never utilized at the facility.

A risk analysis was performed by CH2M Hill for those soil constituents exceeding IEPA objectives. U.S. EPA guidance documents were utilized and results indicated that levels of risk

### **SWMU 6 - Former Product and Hazardous Waste Storage Tank Area**

were a minimum two orders of magnitude below U.S. EPA criteria. On March 11, 1994, IEPA apparently agreed with these determinations as they indicated that no further investigation or remediation appeared to be necessary.

Rexam currently considers this March 11, 1994, IEPA letter as formal closure of the unit. Contrary to Rexam's understanding, the area is still involved in the closure review process, as indicated by a phone conversation with Mr. Jim Moore of IEPA on October 31, 1997.

**Wastes Managed:** This unit managed numerous wastes including waste MEK, freon, and other non-specified F005 hazardous wastes. Two adjacent product tanks managed virgin MEK.

**History of Releases:** Soil sampling in 1992 indicated that methanol and eight PNAs were the only remaining constituents above IEPA cleanup objectives. A risk analysis performed by CH2M Hill for these constituents indicated no human health risks posed by their presence.

**Potential for Past/present Release:**

High ( X )  
Moderate (   )  
Low (   )

**Conclusions:** This unit was removed as part of an IEPA-approved RCRA closure plan. However, available file materials indicate this unit is still undergoing closure. Therefore, further soil and groundwater sampling may be required to determine if residual contamination exists. It is recommended that any sampling activities be coordinated with IEPA representatives overseeing the closure.



## **SWMU 7 - Hazardous Waste Storage Shed**

**Report Photograph No(s):** 8 and 9

**Log Book Photograph No(s):** 1-10 and 1-11

**Period of Operation:** 1970 to present

**Location:** The shed is a free-standing building located in the southeast corner of the Rexam property, approximately 50 feet east of the southeast corner of the Rexam Manufacturing Building.

**Physical Description:** This unit consists of a steel shed with a concrete foundation that has a sloped entry to the north and a six-inch by six-inch concrete curbing for spill containment to the south, east and west. Floor drains were not observed in the foundation which appeared to be in good condition.

Hazardous wastes generated throughout the facility are brought to this unit from their respective satellite and temporary storage areas. Contributing areas include the Waste Oil Storage Cabinet (SWMU 3), the Ink Room Temporary Storage Area (SWMU 1) and the Adhesives Room Satellite and Temporary Storage Area (SWMU 5). With the exception of waste ballasts, hazardous wastes are stored on the western half of the shed in areas specific to each waste stream and are clearly marked with signs. Product is stored on the eastern half of the shed along with PCB containing waste ballasts. Logs are kept of the wastes stored in the shed and are reportedly updated during weekly inspections. Wastes are reportedly removed on a quarterly basis.

**Wastes Managed:** The shed manages 55-gallon drums of waste inks (solvent-based and water based), waste solvents (from both printing and laminating), waste adhesives, waste oil, waste coatings, waste antifreeze, and waste ballasts from florescent lights. According to manifests, hazardous materials have been shipped by Precision Energy Systems, Inc. to Nuclear Sources and Services (disposal facility) in Texas.

**History of Releases:** No evidence of release was identified in U.S. EPA or IEPA file materials or during the VSI.

**Potential for Past/present Release:**

High ( )  
Moderate ( )  
Low (X)

**Conclusions:** No further action for this SWMU since no evidence of releases or probability of releases were identified during the PA/VSI.



#### IV. AREAS OF CONCERN

This section presents a description of the Area of Concern (AOC) identified during the PA and VSI at the Rexam Medical Packaging facility. The photograph number corresponds to the photograph presented in the Photograph Log in Appendix A.

## **AOC A - Current and Former Product Underground Storage Tank Area**

### **Photograph No: 1-14**

**Description:** This area southwest of the Rexam Manufacturing Building contained a total of three 2,000-gallon product USTs that managed virgin isopropanol, MEK and a 1090 blend (10% n-propyl acetate, 90% n-propyl alcohol).

These tanks were replaced in 1987, due to concerns relating to tank age and tank integrity. The steel tanks were replaced with double containment fiberglass tanks, strapped and anchored to a concrete pad, and were reportedly equipped with cathode protection as well as audio/visual release alarms.

In January 1993, the isopropanol tank was determined to have imploded. The tank was removed on April 11, 1995, and was not replaced.

According to Rexam representatives, the imploded tank did not appear to be leaking and analytical results presented in response to an additional information request indicated no elevated levels of isopropanol in the groundwater, although no soil sampling information was presented. At the time of the VSI, evergreen shrub (see Report Photo No. 10) stressed vegetation was observed less than eight feet from the MEK tank access covers and less than three feet from the 1090 Blend tank access covers. The stressed vegetation was an although other shrubs in the immediate area appear healthy.

**Conclusions:** Though the imploded tank has been removed and groundwater analysis indicates no elevated levels of contaminants, soil sampling may be required to determine if contamination exists. It is recommended that any sampling activities be coordinated with IEPA. As impacted soil may be present, release potential for this unit is moderate. Although there is no documented evidence of a release directly impacting the vegetation, the possibility should not be dismissed without further analysis.

## V. CONCLUSIONS

The Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6) underwent corrective actions as part of an IEPA-approved RCRA closure plan. However, available file materials indicate this unit is still undergoing closure. Therefore, further soil and water sampling may be required at this unit to determine if residual contamination exists. It is recommended that any sampling activities be coordinated with IEPA representatives overseeing closure.

Groundwater analytical results at the Current and Former Product Underground Storage Tank Area (AOC A) has groundwater analytical results that indicate no exceedences of IEPA levels. However, confirmation soil sampling was not performed to determine if past releases remained in the soil. This AOC is characterized as having a moderate potential for release. Sampling of the area is recommended to confirm the presence or absence of any releases. It is recommended that any sampling activities be coordinated with IEPA.

All other SWMUs were found to have no history or evidence of release and/or were equipped with sufficient release controls.





## VI. REFERENCES

1. Illinois State Geological Survey Circular 460. Summary of the Geology of the Chicago Area; H.B. Willman. 1971.
2. Illinois Environmental Protection Agency, compliance inquiry letter to American Convertors, Incorporated regarding August 14, 1984 inspection; dated August 21, 1984.
3. American Convertors, Incorporated, compliance inquiry response letter to the Illinois Environmental Protection Agency; dated August 29, 1984.
4. Illinois Environmental Protection Agency, information request from American Convertors, Incorporated; dated January 11, 1985.
5. Illinois Environmental Protection Agency, letter to American Convertors, Incorporated regarding response to information submittal of January 28, 1985; dated February 15, 1985.
6. Illinois Environmental Protection Agency, letter to American Convertors, Incorporated regarding July 9, 1985 inspection; dated July 29, 1985.
7. American Pharmaseal Mundelein Facility, Contingency Plan; dated January 23, 1985.
8. American Pharmaseal, Uniform Hazardous Waste Manifest; dated March 7, 1986.
9. Baxter Healthcare Corporation, Closure Plan for Hazardous Material Underground Tank; dated April 9, 1990.
10. Illinois Environmental Protection Agency, letter to Baxter Healthcare Corporation concerning suspected releases; dated April 18, 1990.
11. Baxter Healthcare Corporation, public notice of closure; dated April 20, 1990.
12. Baxter Healthcare Corporation, letter to Illinois Environmental Protection Agency regarding UST Closure Plan Questions; dated July 3, 1990.
13. Illinois Environmental Protection Agency, Closure Plan Review Notes and Checklist, Section A: Review Notes; dated July 5, 1990.
14. Illinois Environmental Protection Agency, letter concerning conditional closure plan approval; dated July 10, 1990.

15. Illinois Environmental Protection Agency, letter indicating no public comments to closure of hazardous waste UST; dated October 17, 1990.
16. Groundwater Technology, Incorporated, letter to Illinois Environmental Protection Agency, request to modify closure plan; dated January 18, 1991, received during VSI, October 7, 1997.
17. Illinois Environmental Protection Agency, letter to Sy Levine, summary of January 23, 1991 inspection of Baxter Pharmaseal; dated February 27, 1991.
18. Baxter Healthcare Corporation, letter to Illinois Environmental Protection Agency regarding alleged air permit violations; dated March 19, 1991.
19. Baxter Healthcare Corporation, letter to Illinois Environmental Protection Agency regarding 30-day extension request for Revised RCRA Closure Plan; dated July 16, 1991.
20. Baxter Healthcare Corporation, submittal of Partial Closure Report and Revised Closure Plan; dated August 30, 1991.
21. Baxter Healthcare Corporation, memo to Illinois Environmental Protection Agency regarding January 22, 1992 meeting; dated January 28, 1992.
22. Baxter Healthcare Corporation, submittal of Closure Plan Modification to Illinois Environmental Protection Agency; not dated, likely February 1992.
23. Illinois Environmental Protection Agency, letter to Baxter Healthcare Corporation regarding conditional approval of groundwater portion of Closure Plan Modification request; dated June 1, 1992.
24. Illinois Environmental Protection Agency, letter to Baxter Healthcare Corporation regarding disapproval of November 1992 Closure Documentation Report; dated March 1, 1993.
25. Baxter Healthcare Corporation, submittal of Revised Closure Documentation Report to Illinois Environmental Protection Agency, dated August 13, 1993.
26. Illinois Environmental Protection Agency, letter to Baxter Healthcare Corporation regarding disapproval of Revised Closure Documentation Report; dated November 16, 1993.
27. Baxter Healthcare Corporation, letter to Illinois Environmental Protection Agency regarding December 3, 1993 conference call; dated December 9, 1993.



28. Illinois Environmental Protection Agency, letter to Baxter Healthcare Corporation indicating that no further investigation/remediation is necessary; dated March 11, 1994.
29. Illinois Environmental Protection Agency, Operating Permit No. 86070075 granted, issued December 23, 1994.
30. DRG Medical Packaging, Annual Stormwater Site Compliance Evaluation submittal to Illinois Environmental Protection Agency; dated July 26, 1995.
31. Illinois Environmental Protection Agency, January 25, 1996 inspection summary to Mel Villalobos; dated February 26, 1996.
32. Illinois Environmental Protection Agency, Operating Permit No. 86070075 granted on February 28, 1996.
33. Rexam Medical Packaging, Emergency Plan, page 9; received during VSI, October 7, 1997.
34. Rexam Medical Packaging, facility history packet; received during VSI, October 7, 1997.
35. Rexam Medical Packaging, schematic of product tanks in AOC A; received during VSI, October 7, 1997.
36. Rexam Medical Packaging, MSDS sheets for products used in facility operations; received during VSI, October 7, 1997.
37. United States Department of the Interior Geological Survey, Wheeling, Illinois Quadrangle, last revision 1980, received during VSI, October 7, 1997.
38. Baxter Healthcare Corporation, Facility Wastewater Discharge Plan, dated December 10, 1992, received during VSI, October 7, 1997.
39. Phone conversation between M. Powers, TechLaw, and J. Moore, IEPA. Discussed current closure status of Rexam Medical Packaging, Mundelein, October 31, 1997.
40. Phone conversation between M. Powers, TechLaw, and M. Heaton, IEPA. Discussed current closure status of Rexam Medical Packaging, Mundelein, October 31, 1997.
41. Rexam Medical Packaging, response to TechLaw Additional Information Request, dated November 13, 1997.



---

**APPENDIX A**  
**Visual Site Inspection Photograph Log**







Report Photo No.: 1  
Log Book Photo No.: 1-2  
Date: 10/7/97

Time: 1017  
Direction: SW

Description: View of Ink Room Temporary Storage Area (SWMU 1). Orange drum is dyne waste, other drums are waste solvent-based inks.



Report Photo No.: 2

Log Book Photo No.: 1-3

Date: 10/7/97

Time: 1026

Direction: S

Description: View of Ink Room Satellite Storage Area (SWMU 2). Waste solvent-based inks and waste water-based inks were present (drums with funnels) as well as one drum of dyne waste (orange drum on bottom left). Other three drums (two with pumps, one without) contain product water-based inks. Containers in shelving units contain product inks, both solvent-based and water-based.





Report Photo No.: 4  
Log Book Photo No.: 1-6  
Date: 10/7/97

Time: 1040  
Direction: E

Description: View of the Safety Kleen Parts Washer (SWMU 4).



Report Photo No.: 3  
Log Book Photo No.: 1-5  
Date: 10/7/97

Time: 1036  
Direction: S

Description: View of Waste Oil Storage Cabinet (SWMU 3).



Report Photo No.: 5  
Log Book Photo No.: 1-7  
Date: 10/7/97

Time: 1051  
Direction: S

Description: View of southern portion of Adhesives Room Satellite and Temporary Storage Area (SWMU 5). The cardboard on the floor is reportedly used to ease maintenance since small, infrequent drips from transfer containers may occur. The floor below reportedly contains slight discolorations, though it has not received major spills.





Report Photo No.: 6  
Log Book Photo No.: 1-8  
Date: 10/7/97

Time: 1056  
Direction: N

Description: View of a northern portion of Adhesives Room Satellite and Temporary Storage Area (SWMU 5). Only products were reportedly stored in this portion of the room, although during the VSI both waste and product drums were observed.



Report Photo No.: 7

Log Book Photo No.: 1-9

Date: 10/7/97

Time: 1100

Direction: NE

Description: View of the area where the Former Product and Hazardous Waste Underground Storage Tank Area (SWMU 6) was located. SWMU is currently paved with asphalt.



Report Photo No.: 8  
Log Book Photo No.: 1-10  
Date: 10/7/97

Time: 1102  
Direction: SW

Description: View of the western portion of the Hazardous Waste Storage Shed (SWMU 7). Note the curbing and sloping floor to the north. Product drums appear in the foreground.





Report Photo No.: 9  
Log Book Photo No.: 1-11  
Date: 10/7/97

Time: 1104  
Direction: SE

Description: View of the eastern portion of the Hazardous Waste Storage Shed (SWMU 7). Wastes containing PCBs are stored in the drum with a yellow lid while other drums contain product.



Report Photo No.: 10  
Log Book Photo No.: 1-14  
Date: 10/7/97

Time: 1114  
Direction: N

Description: View of the Current and Former Underground Storage Tank Area (AOC A). Access covers are marked MEK (right) and 1090 Blend (left). Note stressed vegetation as indicated by the unhealthy evergreen.



Report Photo No.: 11  
Log Book Photo No.: 1-1  
Date: 10/7/97

Time: 1015  
Direction: W

Description: View of a recycling containers. Tyvek scrap generated by the manufacturing process is removed from machinery by vacuum (mounted on top of drum) and collected in drums. Scrap plastics are collected in the open container.





Report Photo No.: 12  
Log Book Photo No.: 1-4  
Date: 10/7/97

Time: 1028  
Direction: S

Description: View of a scrap plastic in boxes to be recycled.



Report Photo No.: 13  
Log Book Photo No.: 1-12  
Date: 10/7/97

Time: 1109  
Direction: SE

Description: View of Dumpster. Note broken fence surrounding dumpster.



Report Photo No.: 14  
Log Book Photo No.: 1-13  
Date: 10/7/97

Time: 1110  
Direction: E

Description: View of recyclable material temporary storage area. These materials are awaiting removal by recycling company.

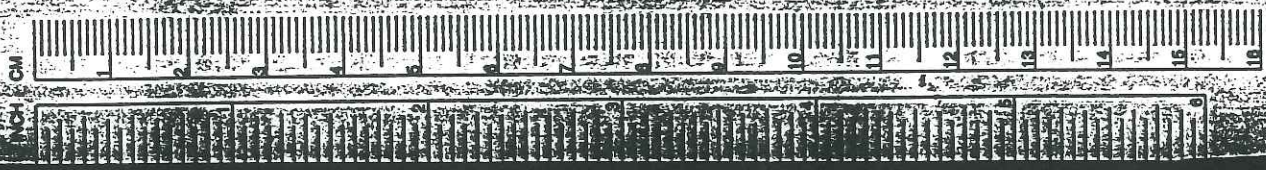


---

**APPENDIX B**  
**Visual Site Inspection Field Notebooks**



# MEASUREMENT CONVERSIONS



IF YOU KNOW	MULTIPLY BY	TO FIND
<b>LENGTH</b>		
inches	2.540	centimeters
feet	30.480	centimeters
yards	0.914	meters
miles	1.609	kilometers
inches	0.039	inches
centimeters	0.393	inches
feet	3.280	feet
meters	1.093	yards
kilometers	0.621	miles
<b>WEIGHT</b>		
ounces	28.350	grams
pounds	0.453	kilograms
grams	0.035	ounces
kilograms	2.204	pounds
<b>VOLUME</b>		
fluid ounces	29.573	milliliters
pints	0.473	liters
quarts	0.946	liters
gallons (U.S.)	3.785	liters
milliliters	0.033	fluid ounces
liters	1.056	quarts
liters	0.264	gallons (U.S.)
<b>TEMPERATURE</b>		
$C = (F - 32) \times \frac{5}{9}$ $F = (C \times 1.8) + 32$		
<b>Length</b>		
inches	Decimals of foot	Milli-inches
1/16	.0052	1.5875
1/8	.0104	3.1750
3/16	.0156	4.7625
1/4	.0208	6.3500
5/16	.0260	7.9350
3/8	.0313	9.5250
1/2	.0417	12.7000
5/8	.0521	15.8750
3/4	.0625	19.0500
7/8	.0729	22.2250
1	.0833	25.4000
1 1/8	.1042	30.4800
1 1/4	.1250	36.5750
1 3/8	.1458	42.6750
1 1/2	.1667	48.7750
1 5/8	.1875	54.8750
1 3/4	.2083	60.9750
1 7/8	.2292	67.0750
2	.2500	73.1750
2 1/8	.2708	79.2750
2 1/4	.2917	85.3750
2 3/8	.3125	91.4750
2 1/2	.3333	97.5750
2 5/8	.3542	103.6750
2 3/4	.3750	109.7750
2 7/8	.3958	115.8750
3	.4167	121.9750
3 1/8	.4375	128.0750
3 1/4	.4583	134.1750
3 3/8	.4792	140.2750
3 1/2	.5000	146.3750
3 5/8	.5208	152.4750
3 3/4	.5417	158.5750
3 7/8	.5625	164.6750
4	.5833	170.7750
4 1/8	.6042	176.8750
4 1/4	.6250	182.9750
4 3/8	.6458	189.0750
4 1/2	.6667	195.1750
4 5/8	.6875	201.2750
4 3/4	.7083	207.3750
4 7/8	.7292	213.4750
5	.7500	219.5750
5 1/8	.7708	225.6750
5 1/4	.7917	231.7750
5 3/8	.8125	237.8750
5 1/2	.8333	243.9750
5 5/8	.8542	250.0750
5 3/4	.8750	256.1750
5 7/8	.8958	262.2750
6	.9167	268.3750
6 1/8	.9375	274.4750
6 1/4	.9583	280.5750
6 3/8	.9792	286.6750
6 1/2	1.0000	292.7750



Name Ann L. Anderson

Address 10 S. Wacker Drive  
Chicago, IL 60606

Phone 312-345-8921

Project Roxam Medical Pkging

"Rite in the Rain" - a unique all-weather writing surface created to shed water and to enhance the written image. Makes it possible to write sharp, legible field data in any kind of weather.

a product of  
**J. L. DARLING CORPORATION**  
 TACOMA, WA 98424-1017 USA









adhesive laminates  
catalytic after burner 97%

Slitting operation  
slit films used in other processes

pouch and bag make

13 areas coat distribution

blown film extrusion roller shuts down

Lexan at business center  
world wide

2/400 10/12/97

1990 began transitioning  
to water based ink,  
but difficult for them to  
adhere to film

In 1993 id'd good mfg.

6 types of ink remain

Lamination  
polyurethane adhesives.

Coilings - Rent / seal coil films  
for polylube pouches

use MEK and Xylene

Coilings are H<sub>2</sub>O based  
adhesive entry mat -  
H<sub>2</sub>O based cleans shows.

→ Safety Klean Parts Washer -  
(1) on site

1995 - switched to non-hazardous  
ASA 10/12/97



Cleaned every 3 mos.

Spill oil - stored in drums

Solid Waste

- Plastic Sump - regrid  
put back into process

- Bins to collect other  
and sold to vendor

- Cardboard - resold

- Wooden skids -  
recycle damaged back to vendor

- Tack mat -  
20 polyethylene make front

4/30 Aja 10/17/17

Aluminum - sold back.

- Used film cones - cardboard spool

- Gaylord box -  
cardboard boxes

⇒ ballast - stored in 55 gal  
drum - picked up approx 1980

Mr. Fox here since 1983  
Env. Coordinator June 7 1995

Waste Management

⇒ Satellite Area in "The Mining Room"

the Mining Person reads into  
now called  
the room

2 HW drums

1 / 1

H<sub>2</sub>O based Solvent based

3rd drum contains dyne  
Orange drum waste  
ADA 10/17/17



Printer station  
wastes at the unit  
from cleanups -  
(Solvent) or bad ink.

Operator takes to satellite  
area.

tested by Waste Hauler -

1. Flammable.
2. No foreign substances.

When drum full, capped moved  
outside on skid.

Manually taken to HW Storage  
forklift Shed

Examination Area Satellite Area.

Addressed Wastes / Solvent

HW of NHW

two drums labeled

by operator

4/10/97

When drums full,  
moved by forklift.  
moved within 24 hrs.

Cage = HW Storage Shed.  
Stored in specific area.  
Keeps log of what's brought  
in.

weekly audit of satellite  
areas, about storage shed.  
checks 90 day window.

Fluorescent 4 bulb., mercury  
switches stored in 55 gallon drum  
picked up by EMCO. No longer  
out on site.

Used oil from machine shop.  
oil drained from prod line  
by mechanic → 5 gal cont.

then Machine Shop, poured into  
55 gal drum.

When full, transported to back cage.  
Aga 10/7/97-7/20



Antyfreeze 55 gal  
2 drums on site.

skeleton crew at X Mas tree.

outside contractor comes in,  
drains antyfreeze, inspects it.

filled and transported to  
cage.

\* MSDS sheets for all  
inks, solvents, antyfreeze,

Closure of Tanks.

MEK - 3000 gal capacity

Toluene - 3000 gal

Waste tank 3000 gal

connected to adhesive mixing  
room.

two drain, also in  
storage room  
grinding floor

9/20 Dfa 10/1/AT

any spills to drain, then  
to tank.

tanks put in in 1970  
old steel drums.

concern reaching end of  
life span.

dug in, dug deep brought  
in heavy fill, sand, gravel.

extracted vent off-site.

gave okay for closure. blankety.

closed pipes now.

now toluene in drums only.

MEK piped from up front.

waste lines got changed  
from back of doc, completely  
removed.

Apr 12/1/AT 1/80



original  
1987 - front tanks removed

also steel - 17 yrs old  
pulled.

replaced with double walled  
cathode protected

automatic system

visual, audio alarm  
warning with N. spill.

9  
In 1983 - front tank had  
exploded & boiler had  
to replace it. Later  
corrected tank removed.

\* in cradles held in place  
in cement straps.

Production areas - floor sealed  
every two years.

nothing discharge to sewer lines

10/100 a/ga 10/1/97

drains are capped.

Storm Water Permit:

Retention Pond -

no chance of production  
waste water to go to retention  
pond.

fence around plant, stand is  
locked by 3rd shift.

HW cage is locked.

Rail line bins in plastic  
for extension lines, 10' chain  
linked fence.

NON VOC cleaners used in  
prod. areas.

quartzes rep.

aga 10/1/97 14/100



scrap recycling  
① representation  
grey in scrap plastic.

blue is linked to vent  
pulls scrap from production  
line and later sold.

Cablecar print plates  
mfg. offsite -  
just mount here.

12/10  
apw 10/1/97

② temp. storage area  
outside ink room.  
less than 24 hours.

mounted on wooden ply  
4' HWD

product is crumpled down

Sparks proof with grounding wires

ink mixing rooms -  
only ink solvent

NDM is sunken by 4'-6" : E  
ramps to entrance  
no floor drain.

solvent based print lines  
housed in hooded room

\* Vent to  
- catalytic oxidizer

apw 10/1/97  
13/20



representative  
\$ - picture of scrap  
boxes

rt = plastic

midg = truck

left = poly bag

on wooden studs

⇒ Waste Oil Storage Cabinet

Oil collected in 55 gal drum

bottom if necessary  
in filled & sealed for now

Compressor room

⇒ adjacent to sklem tank

Washers → 50 gallons

Capacity

poly containers

14/11 15/11  
15/11 16/11  
after 10/11/17

Laminating Room  
Catalytic Oxidizer after burner.  
totally enclosed room.

adhesive → catalytic oxidizer  
carbons flames  
99% destroyed.

Adhesive Storage  
Satellite Area

across aisle for temp.  
storage.

no drains.

ramped to room

#7 HW Storage Sheds  
sloped floor, 6" concrete  
curbing ramped access.

after 10/11/17 15/20



white = laminatin  
silver = adhesive.

---

6 waste streams /

spectra areas for each.

at time of V31, no bulbs  
in drums. cracks.

PCB solvent

mercury light bulbs stored here.

special waste - spill dry.

sawdust / yflow sweeping  
go to trash.

MTI Avenue Manila

APR 10 1997

⇒ swap materials storage area  
\* Recycling Vendor

CMCO picks up used oil

2 tanks left -

150 removed when imploded.

1800 gal max.

MAX can rupture.

1090 blend / - see handout.

1  
Nailing posts / nails.

abortion

11:20 end tour

LABS

test products, inks, adhesives

APR 10 1997 1700

Testing of sorts

Left site @ 1:00 p.m.

Jan J. Anderson

2/10

REXAM MEDICAL PACKAGING  
1919 S BUTTERFIELD ROAD  
MUNDELEIN IL 60060  
USA  
FAX 1 708 362 1848  
1 708 918 4276  
L-47

REXAM

JIM W FOX  
ENVIRONMENTAL  
COORDINATOR

h



# REXAM

REXAM MEDICAL PACKAGING  
1919 S BUTTERFIELD ROAD  
MUNDELEIN IL 60060  
USA  
FAX 1 708 362 1848  
1 708 918 4276  
847

JIM W FOX  
ENVIRONMENTAL  
COORDINATOR

TIMOTHY J. RACHKE  
GENERAL MANAGER

TIM.J.RACHKE@REXAM.COM

$= \frac{\text{chord}^2}{R}$   
 $= \frac{1}{D}$   
} chord def.  
is, will equal  
or 1° for 1 ft.)  
he product by  
tiplied the angle

e by twice the

VARC. ADDITION TO BASE FOR HYPOTENUSE

Given Base 100, Alt.  $10.10^2 + 200 = .5$ ,  $100 + .5 = 100.5$  hyp.

Given Hyp. 100, Alt.  $25.25^2 + 200 = 3.125$ ,  $100 - 3.125 = 96.875 =$  Base.

Error in first example, .002; in last, .045.

To find Tons of Rail in one mile of track: multiply weight per yard by 11, and divide by 7.

LEVELING. The correction for curvature and refraction, in feet and decimals of feet is equal to  $0.574 d^2$ , where  $d$  is the distance in miles. The correction for curvature alone is closely,  $\frac{1}{2} d^2$ . The combined correction is negative.

PROBABLE ERROR. If  $d_1, d_2, d_3$ , etc. are the discrepancies of various results from the mean, and if  $\sum d^2$  the sum of the squares of these differences and  $n$  = the number of observations, then the probable error of the mean =  $\pm 0.6745 \sqrt{\frac{\sum d^2}{n(n-1)}}$

MINUTES IN DECIMALS OF A DEGREE

1'	.0167	11'	.1833	21'	.3500	31'	.5167	41'	.6833	51'	.8500
2	.0333	12	.2000	22	.3667	32	.5333	42	.7000	52	.8667
3	.0500	13	.2167	23	.3833	33	.5500	43	.7167	53	.8833
4	.0667	14	.2333	24	.4000	34	.5667	44	.7333	54	.9000
5	.0833	15	.2500	25	.4167	35	.5833	45	.7500	55	.9167
6	.1000	16	.2667	26	.4333	36	.6000	46	.7667	56	.9333
7	.1167	17	.2833	27	.4500	37	.6167	47	.7833	57	.9500
8	.1333	18	.3000	28	.4667	38	.6333	48	.8000	58	.9667
9	.1500	19	.3167	29	.4833	39	.6500	49	.8167	59	.9833
10	.1667	20	.3333	30	.5000	40	.6667	50	.8333	60	1.0000

INCHES IN DECIMALS OF A FOOT

1-16	3-32	$\frac{1}{4}$	3-16	$\frac{1}{4}$	5-16	$\frac{3}{8}$	$\frac{1}{2}$	$\frac{3}{4}$	$\frac{7}{8}$	$\frac{15}{16}$	1
.0052	.0078	.0104	.0156	.0208	.0260	.0313	.0417	.0521	.0625	.0729	
1	2	3	4	5	6	7	8	9	10	11	
.0833	.1667	.2500	.3333	.4167	.5000	.5833	.6667	.7500	.8333	.9167	

Ann Anderson and Michael Powers arrived at Rexam at 8<sup>45</sup>, clear and warm 80's Met w/ Jim Fox at 8<sup>55</sup>, proceeded to conference room

- explained here as part of RCRA to view summaries & AOCs and defined bath, first preliminary assessment, now VSI
- objectives to learn processes from virgin product to manufactured product - past & present
- info. used for NCAPS, explained scoring process
- Fox: how picked for review? RCRA storage tank
- now corporate high consolidation & construction

& Rexam nationally

Received history packet  
IS inline flexo print

Jim Fox only  
staff present during tour

- 4 offline - water & solvent - solvent hooked to catalytic afterburner 99%
- 1 adhesive laminating & coating - water & solvent
- 2 offline - solvent - connected to catalytic
- 97.5% eff

slitting operation - alter size of product & properties  
pouch & bag making - attach noted products by glue - fusion

194,000 sq ft. - breakdown

blown film extrusion operate 24 hr  
- built in 1970

- Rexam called DRG tower between Bunker & Rexam

→ name change

MP 10/7/97



(2)

Title V permit in process, deemed complete

1990 moved from solvent to water-based inks  
took some time

1993 began conversion after finding good manufact.  
of water-based, still use solvent-based for some  
package

- testing

Primary Waste Streams

Laminating - solvents

- polyester + polyethylene combined

- MEK + Toluene used for Lam. + Cont. process

- water-based adhesives used + solvent-based also

\* Secondary

1. Safety Clean Parts Washer, now use non haz. solvent

- changed every 3 months

used oil from prod. eg  
antifreeze

20% scrap plastic reground and re-used

polyprop. - sold to recyc center

cardboard -

skids - sold to vendor when damaged

Tackmat - sold to recyc

Alum. - sold

Paper - collected each day, recyc

MP 10/7/97

(3)

used film, gaylord boxes (contain product plastics),  
drums recycled

Quarterly Haz Waste Pick-up

PCB containing capacitors - 1 drum/yr  
collected in 55-gal drum

VSTs - 3 product only

- hope to remove tanks w/ elimination of solvent-based

D. Fox here since 1983, Envir. Coord. since June '95

Process:

\* Satellite Area in Ink Mixing Room

- 2 drums: 1 solvent + 1 water-based  
labeled

waste @ printing station - cleanup + waste ink  
- tested by waste hauler

drum when full, capped, placed on skid, and taken  
to Haz Waste Storage Shed on Forklift  
→ organized + labeled  
in cage

Lamination Area

- 2 drums: 1 sol + 1 water-based  
same process as above

24 hr time limit to pick-up and take to

- records kept of transp. at satellite + shed

- nothing past 90 day  
report

MP 10/7/97



(4)

## Building maintenance

drum for balasts stored in shed

## \* Used Oil

- machine shop houses 55 gal, when full → shed
- oil drained into 5 gal, collected in machine shop

## \* Used Antifreeze

- once a year near December, fill 2 drums (55 gal)

sent to shed

→ will provide MSDS on Inks/Solvents

Former

## \* UST Closure

3,000 gal MEK

3,000 gal Toluene

3,000 gal Waste Tank - drain line into adhesive mixing room + in storage room (2 floor drains)   
 no longer present

→ 1970 installation, steel tanks, concerned about leaks

All 3 pulled, soil removed and containerized  
put in new dirt, sand, gravel

- EPA Closed site, parking lot placed over area

- drains plugged

- tank + lined plugged w/ dry adhesive

MP 10/7/97

(5)

1987 - 3 original tanks near SW corner removed  
old steel

1987 - 3 new double walled, catode protected  
w/ visual & audio alarm

1993 - most western of 3 tanks replaced - later J. Fox  
stated that tank was removed, ~~not replaced~~

⇒ will follow up w/ info - believes on concrete slab  
and strapped

Floors sealed in production area

- resealed every 2 yrs

- Near sewer discharge

drains near lamination area plugged

Have stormwater permit, have retention pond - weekly monitoring

⇒ manual w/ stormwater to be provided

- no drains in production area

Barbed wire

Fenced property, Area locked, fenced areas locked up

Plastic pellets brought in by rail car + transferred  
to production building

MP 10/7/97



(6)

Photo #	Direction Facing	Description
10 <sup>15</sup>	1-1 NW	Typical Recycling Dept
10 <sup>17</sup>	1-2 SE	Haz Waste Drums outside storage room awaiting transport to outside storage area, flammable & grounded
10 <sup>26</sup>	1-3 S	Ink Room - Solvent & water-based inks, drier cabinet
10 <sup>28</sup>	1-4 S <sup>mp</sup>	Scrap Plastic to be recycled
10 <sup>38</sup>	1-5 S <sup>mp</sup>	Waste Oil collection area in Flamm & Haz waste storage room
10 <sup>40</sup>	1-6 E	Safety Clean Parts Washer in Flamm & Haz
10 <sup>51</sup>	1-7 S	Storage room - 50-gal Adhesive Storage tank 1 of 2 Satellite Adhesives & product and waste stored in water based on far left, other 3 solvent based - Adhesive Storage (5) on right Haz and non haz waste and product rest of - no floor drain
10 <sup>56</sup>	1-8 N	Former UST Area, paved by on roof catalytic oxidizer & catalytic afterburner (on left)
11 <sup>01</sup>	1-9 NE	

m p 10/17/97

(7)

- Types recycled in vacuum drum, scrap plastic in can
- Catalytic oxidizer attached to booth around solvent pres in SC 99% & 97%
- Catalytic oxidizer in SC

L8/10/01 All



(8)

11 <sup>02</sup>	1-10	SW	Haz Waste Storage Shed curbing to S, E, W, and sloped up to north, haz waste on West side, product on East PCB in yellow top drum, <sup>Haz waste shed</sup> others product, <sup>boxes on left contain bulbs</sup>
11 <sup>09</sup>	1-12	SE	Gen waste dumpster - note broken fence
11 <sup>10</sup>	1-13	E	Materials to be recycled - note fence
11 <sup>14</sup>	1-14	N	Access to MEK & 1070 blend

mp 10/7/97

(9)

Eastern area curbed &amp; fenced &amp; sloped

\*\*\* note B tank skated was replaced on 9/3  
was not replaced, only 2 tanks  
present

Sfer Lab is now office

waste lab products - dyne solution used on testing  
to check surface tension - collected in 1 gal  
jar in lab, taken by hand to ink room

1.5 → 2 yrs to generate 5 5-Gal drum  
in ink room  
orange drum, sealed

- also generated (dyne) on prod. line in small containers  
and taken to same drum

mp 10/7/97



⑩

\* waste mercury-based switches no longer waste stream  
- formerly stored in drums + removed by Enco

12<sup>00</sup>

Wrap up Meeting - J. Fox + Mr. Rachke

Catalytic  
Laminator Afterburner - Grace Tech. Corporation

650°F, burns off VOCs, some contain removed in  
charcoal bed

99%  
Eff

Flexopress

Catalytic Oxidizer - water + solvent-based

run, water-based reduces temp, need more  
fuel to increase heat => lower efficiency

97%  
Eff

last inspected July - August by Grace Tech  
- removed old charcoal beds

→ MSDS

→ VST Info

→ Clean Layout

MA 10/7/97

---

**APPENDIX C**  
**Facility Layout and SWMU/AOC Locations**





SWMU 7 →



